

EXHIBIT C

WILLKIE FARR & GALLAGHER LLP

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

LORI C. ARAKAKI (SBN: 315119)

larakaki@willkie.com

ARGEMIRA FLOREZ (SBN: 331153)

aflorez@willkie.com

One Front Street, 34th Floor

San Francisco, CA 94111

Telephone: (415) 858-7400

Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

ANIBAL RODRIGUEZ, JULIEANNA MUNIZ,
ELIZA CAMBAY, SAL CALTADO, EMIR
GOENAGA, JULIAN SANTIAGO, HAROLD
NYANJOM, KELLIE NYANJOM, and SUSAN
LYNN HARVEY individually and on behalf of
all other similarly situated,

Plaintiffs

vs

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688 RS

**DEFENDANT GOOGLE LLC'S
RESPONSES TO PLAINTIFFS'
REQUESTS FOR ADMISSION,
SET FOUR**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor
Action Filed: July 14, 2020
Trial Date: Not Set

PROPOUNDING PARTY: Plaintiffs Anibal Rodriguez, Sal Cataldo, Julian Santiago, and Susan Lynn Harvey ("Plaintiffs")

RESPONDING PARTY: Defendant Google LLC

SET NO.: Four

1 Subject to and without waiving the foregoing objections, Google responds as follows:
2 Denied.

3 **REQUEST FOR ADMISSION NO. 27:**

4 Since the start of the Class Period, Google could have redesigned its products that save
5 WAA-Off Data, including but not limited to the Firebase SDK and the Google Mobile Ads SDK,
6 so that no WAA-Off Data would be saved by Google.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

8 Google objects to this Request as vague and ambiguous.

9 Google also objects that the request is compound.

10 Google also objects that the request is irrelevant.

11 Google also objects that the term “redesigned” is vague and ambiguous.

12 Google also objects that the term “saved” is vague and ambiguous.

13 Google also objects that this Request is an incomplete hypothetical.

14 Google further objects to this Request to the extent that it seeks information protected by
15 the attorney-client privilege and/or the attorney work product doctrine.

16 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
17 it calls for information beyond Google’s knowledge.

18 **REQUEST FOR ADMISSION NO. 28:**

19 Google can delete all WAA-Off Data stored by Google.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

21 Google objects to this Request as vague and ambiguous.

22 Google also objects that the request is compound.

23 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
24 be meaningless.

25 Google also objects that this Request is an incomplete hypothetical.

26 Google further objects to this Request to the extent that it seeks information protected by
27 the attorney-client privilege and/or the attorney work product doctrine.

1 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
2 it calls for information beyond Google's knowledge.

3 **REQUEST FOR ADMISSION NO. 29:**

4 Google has used WAA-Off Data to track, model, or measure cross-app or -site
5 conversions. For purposes of this Request, "cross-app or -site conversions" includes a scenario in
6 which a User interacts with an advertisement within one app, or while on one website, and then
7 "converts" with respect to that prior advertisement within a different app or website (including but
8 not limited to by making a purchase, installing an app, opening an app, or filling out a form).

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

10 Google objects to this Request as vague and ambiguous.

11 Google also objects that the request is compound.

12 Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to
13 be meaningless.

14 Google also objects that the term "track, model, or measure" is vague and ambiguous.

15 Google also objects that the term "interacts" is vague and ambiguous.

16 Google also objects that the term "converts" is vague and ambiguous.

17 Google further objects to this Request to the extent that it seeks information protected by
18 the attorney-client privilege and/or the attorney work product doctrine.

19 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
20 it calls for information beyond Google's knowledge.

21 **REQUEST FOR ADMISSION NO. 30:**

22 Since the start of the Class Period, Google has not provided Users with any way to view
23 WAA-Off Data stored by Google.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

25 Google objects to this Request as vague and ambiguous.

26 Google also objects that the request is compound.

27 Google also objects that the term "Class Period" is vague and ambiguous because it fails to
28 provide a concrete range of time.

1 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
2 be meaningless.

3 Google also objects that the term “view” is vague and ambiguous.

4 Google further objects to this Request to the extent that it seeks information protected by
5 the attorney-client privilege and/or the attorney work product doctrine.

6 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
7 it calls for information beyond Google’s knowledge.

8 **REQUEST FOR ADMISSION NO. 31:**

9 Since the start of the Class Period, Google has not provided Users with any way to delete
10 WAA-Off Data stored by Google.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

12 Google objects to this Request as vague and ambiguous.

13 Google also objects that the request is compound.

14 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
15 provide a concrete range of time.

16 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
17 be meaningless.

18 Google also objects that the term “way to delete” is vague and ambiguous.

19 Google also objects that the term “stored” is vague and ambiguous.

20 Google further objects to this Request to the extent that it seeks information protected by
21 the attorney-client privilege and/or the attorney work product doctrine.

22 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
23 it calls for information beyond Google’s knowledge.

24 **REQUEST FOR ADMISSION NO. 32:**

25 Google cannot identify any privacy policy, terms of service, or other disclosure by a Non-
26 Google App that explicitly informed or informs Users that Google will save WAA-Off Data. For
27 purposes of this Request, “explicitly” requires at a minimum that the disclosure either refer by
28

1 name to Web & App Activity (WAA) or supplemental Web & App Activity (sWAA) or inform
2 Users that Google will save data relating to their app activity without regard to their Google
3 settings.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

5 Google objects to this Request as vague and ambiguous.

6 Google also objects that the request is compound.

7 Google also objects that the term “explicitly informed or informs” is vague and
8 ambiguous.

9 Google also objects that the term “save data” is vague and ambiguous.

10 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
11 be meaningless.

12 Google further objects to this Request to the extent that it seeks information protected by
13 the attorney-client privilege and/or the attorney work product doctrine.

14 Subject to and without waiving the foregoing objections, Google responds as follows:
15 Denied.

16 **REQUEST FOR ADMISSION NO. 33:**

17 Non-Google Apps that use any of GA for Firebase, AdMob, and Cloud Messaging would
18 continue to function and be usable even if Google did not store WAA-off Data collected by way
19 of GA for Firebase, AdMob, and Cloud Messaging.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

21 Google objects to this Request as vague and ambiguous.

22 Google also objects that the request is compound.

23 Google also objects that the term “usable” is vague and ambiguous.

24 Google also objects that the term “did not store” is vague and ambiguous.

25 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
26 be meaningless.

27 Google further objects to this Request to the extent that it seeks information protected by
28 the attorney-client privilege and/or the attorney work product doctrine.

1 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
2 it calls for information beyond Google's knowledge.

3 **REQUEST FOR ADMISSION NO. 34:**

4 Google saves WAA-Off Data generated during Users' interactions with Non-Google Apps
5 by way of webviews.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

7 Google objects to this Request as vague and ambiguous.

8 Google also objects that the term "Users' interactions" is vague and ambiguous.

9 Google also objects that the term "saves" is vague and ambiguous.

10 Google also objects that the term "by way of webviews" is vague and ambiguous.

11 Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to
12 be meaningless.

13 Google further objects to this Request to the extent that it seeks information protected by
14 the attorney-client privilege and/or the attorney work product doctrine.

15 Subject to and without waiving the foregoing objections, Google responds as follows:
16 Denied.

17 **REQUEST FOR ADMISSION NO. 35:**

18 Google cannot identify any non-Google source or disclosure that explicitly informs Users
19 that Google saves WAA-Off Data. For purposes of this Request, "explicitly" requires at a
20 minimum that the source refer by name to Web & App Activity (WAA) or supplemental Web &
21 App Activity (sWAA). For purposes of this Request, "non-Google sources" refers to news articles,
22 academic publications, or any other publications not authored by Google.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

24 Google objects to this Request as vague and ambiguous.

25 Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to
26 be meaningless.

27 Google also objects that the term "explicitly informs" is vague and ambiguous.
28

REQUEST FOR ADMISSION NO. 39:

Google saves WAA-Off Data generated during Users' interactions with the Google Search app.

RESPONSE TO REQUEST FOR ADMISSION NO. 39:

Google objects to this Request as vague and ambiguous.

Google also objects that the term "Users' interaction" is vague and ambiguous.

Google also objects that the request is irrelevant.

Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to be meaningless.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

REQUEST FOR ADMISSION NO. 40:

Using data that is stored within Google logs and data sources, and setting aside any and all Google policies and technical impediments, it is possible to join WAA-off Data with data tied to a user's Google account.

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

Google objects to this Request as vague and ambiguous.

Google also objects that this Request as unintelligible because it requests that Google "set[] aside any and all . . . technical impediments," and thus provide a response based in fantasy.

Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to be meaningless.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

REQUEST FOR ADMISSION NO. 41:

Google saves WAA-Off Data generated during Users' interactions with the YouTube app.

RESPONSE TO REQUEST FOR ADMISSION NO. 41:

Google objects to this Request as vague and ambiguous.

Google also objects that the term "Users' interaction" is vague and ambiguous.

REQUEST FOR ADMISSION NO. 44:

Since the start of the Class Period, every version of the Google Privacy Policy has included the following provision: “We will not reduce your rights under this Privacy Policy without your explicit consent.”

RESPONSE TO REQUEST FOR ADMISSION NO. 44:

Google objects to this Request as vague and ambiguous.

Google also objects that the term “Class Period” is vague and ambiguous because it fails to provide a concrete range of time.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing, Google Admits that the privacy policies it has produced to Plaintiff are accurate.

REQUEST FOR ADMISSION NO. 45:

Google can change its processes so that Google no longer saves WAA-Off Data.

RESPONSE TO REQUEST FOR ADMISSION NO. 45:

Google objects to this Request as vague and ambiguous.

Google also objects that the term “saves” is vague and ambiguous.

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google also objects that the request is irrelevant.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

REQUEST FOR ADMISSION NO. 46:

From March 31, 2020 through the present, Google’s Terms of Service has contained the following provision: “California law will govern all disputes arising out of or relating to these terms, service-specific additional terms, or any related services, regardless of conflict of laws rules.”

RESPONSE TO REQUEST FOR ADMISSION NO. 46:

Google objects to this Request as vague and ambiguous.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing, Google admits that the Terms of Service it has produced to Plaintiff are accurate.

REQUEST FOR ADMISSION NO. 47:

From April 14, 2014 through March 30, 2020, Google's Terms of Service included the following provision: "The laws of California, U.S.A., excluding California's conflict of laws rules, will apply to any disputes arising out of or relating to these terms or the Services."

RESPONSE TO REQUEST FOR ADMISSION NO. 47:

Google objects to this Request as vague and ambiguous.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing, Google admits that the Terms of Service it has produced to Plaintiff are accurate.

REQUEST FOR ADMISSION NO. 48:

Google has used WAA-Off Data it saves to train at least one machine-learning algorithm used by at least one Google product or service, including but not limited to Google Search, YouTube, Gmail, AdMob, Ad Manager, or Ads.

RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Google objects to this Request as vague and ambiguous.

Google also objects that the term "saves" is vague and ambiguous.

Google also objects that the term "train" is vague and ambiguous.

Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to be meaningless.

Google also objects that the request is irrelevant.

1 Google further objects to this Request to the extent that it seeks information protected by
2 the attorney-client privilege and/or the attorney work product doctrine.

3 **REQUEST FOR ADMISSION NO. 49:**

4 Since the start of the Class Period, Google has used WAA-Off Data to create User profiles.
5 For purposes of this Request, the phrase “User profiles” shall include identification of
6 characteristics (e.g., age, gender, location, interests) associated with Users or devices.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

8 Google objects to this Request as vague and ambiguous.

9 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
10 provide a concrete range of time.

11 Google also objects that the term “User profile” is vague and ambiguous.

12 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
13 be meaningless.

14 Google further objects to this Request to the extent that it seeks information protected by
15 the attorney-client privilege and/or the attorney work product doctrine.

16 Subject to and without waiving the foregoing, Denied.

17 **REQUEST FOR ADMISSION NO. 50:**

18 Since the start of the Class Period, Google has served ads to WAA-Off Users based on
19 User profiles. For purposes of this Request, the phrase “User profiles” shall include identification
20 of characteristics (e.g., age, gender, location, interests) associated with Users or devices.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

22 Google objects to this Request as vague and ambiguous.

23 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
24 be meaningless.

25 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
26 provide a concrete range of time.

27 Google also objects that the request is irrelevant.

28 Subject to and without waiving the foregoing objections, Denied.

REQUEST FOR ADMISSION NO. 51:

Google saves WAA-Off Data generated during Users' interactions with the Google Chrome app, including through webviews on Non-Google Apps.

RESPONSE TO REQUEST FOR ADMISSION NO. 51:

Google objects to this Request as vague and ambiguous.

Google also objects that the request is compound.

Google also objects that the term "saves" is vague and ambiguous.

Google also objects that, as defined, the term "Users" is vague, ambiguous, and overbroad.

Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to be meaningless.

REQUEST FOR ADMISSION NO. 52:

Google Firebase, Google Analytics for Firebase, AdMob, and Cloud Messaging are not essential to the functioning of Non-Google Apps.

RESPONSE TO REQUEST FOR ADMISSION NO. 52:

Google objects to this Request as vague and ambiguous.

Google also objects that the term "essential" is vague and ambiguous.

Google also objects that the term "functioning" is vague and ambiguous.

Google also objects that the request is irrelevant.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Dated: October 31, 2022

WILLKIE FARR & GALLAGHER LLP

By: /s/ Benedict Y. Hur
Benedict Y. Hur

WILLKIE FARR & GALLAGHER LLP

Benedict Y. Hur (SBN: 224018)
 Simona Agnolucci (SBN: 246943)
 Jayvan E. Mitchell (SBN: 322007)
 Amanda Maya (SBN: 324092)
 One Front Street, 34th Floor
 San Francisco, CA 94111
 Telephone: (415) 858-7400
 Facsimile: (415) 858-7599
 bhur@willkie.com
 sagnolucci@willkie.com
 jmitchell@willkie.com
 amaya@willkie.com

Attorneys for
 GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

ANIBAL RODRIGUEZ AND JULIEANNA
 MUNIZ, individually and on behalf of all other
 similarly situated

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688

**DEFENDANT GOOGLE LLC'S
 RESPONSES TO PLAINTIFFS'
 REQUEST FOR ADMISSION, SET ONE**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Action Filed: July 14, 2020

Trial Date: Not Set

PROPOUNDING PARTY: PLAINTIFFS ANIBAL RODRIGUEZ AND JULIEANNA
 MUNIZ

RESPONDING PARTY: DEFENDANT GOOGLE LLC

SET NO.: ONE

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure ("Federal Rules"),
 Defendant Google LLC ("Defendant" or "Google") hereby submits these objections and
 responses to Plaintiffs Anibal Rodriguez and Julieanna Muniz ("Plaintiffs") First Set of Request

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Google objects to Request No. 7 as vague and ambiguous as to the undefined term “Web & App Activity.” For purposes of this response, Google construed Web & App Activity to mean the account-level setting called Web & App Activity. Google further objects to this request as vague and ambiguous with respect to the phrases “created profiles,” “using data collected from users’ browsing history,” and “Firebase SDK.” Google further objects that the definition of “Class Period” is vague and ambiguous, as the Requests define the term to mean “the class period in this case, as defined in the operative complaint,” when the “operative complaint” has changed between when the Requests were served and when these responses were provided, and the definition of “Class Period” differs between the original and amended complaints. Google further objects that the term “Class Period” is vague and ambiguous because it fails to provide a concrete range of time. Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Google further objects to this request to the extent that it seeks information that is in the possession, custody or control of third parties. Google further objects to this Request to the extent it is unduly burdensome, overbroad, and disproportionate to the needs of the Action.

Subject to and without waiving the foregoing objections, Google responds as follows: Based on its understanding of this Request, Google denies it.

REQUEST FOR ADMISSION NO. 8:

Since the start of the Class Period, Google has been earning advertising revenue using browsing history data Google collects from users’ interaction with apps that use Google’s Firebase SDK while those users have Web & App Activity turned off.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Google objects to Request No. 8 as vague and ambiguous as to the undefined term “Web & App Activity.” For purposes of this response, Google construed Web & App Activity to mean the account-level setting called Web & App Activity. Google further objects to this request as vague and ambiguous with respect to the phrases “advertising revenue,” “browsing history data Google collects,” “from users’ interaction with apps,” and “Firebase SDK.” Google further

1 objects that the definition of “Class Period” is vague and ambiguous, as the Requests define the
2 term to mean “the class period in this case, as defined in the operative complaint,” when the
3 “operative complaint” has changed between when the Requests were served and when these
4 responses were provided, and the definition of “Class Period” differs between the original and
5 amended complaints. Google further objects that the term “Class Period” is vague and
6 ambiguous because it fails to provide a concrete range of time. Google further objects to this
7 Request to the extent that it seeks information protected by the attorney-client privilege and/or
8 the attorney work product doctrine. Google further objects to this request to the extent that it
9 seeks information that is in the possession, custody or control of third parties. Google further
10 objects to this Request to the extent it is unduly burdensome, overbroad, and disproportionate to
11 the needs of the Action.

12 Subject to and without waiving the foregoing objections, Google responds as follows:
13 Google does not understand this request and therefore lacks information sufficient to admit or
14 deny it.

15 Dated: November 25, 2020

16 WILLKIE FARR & GALLAGHER LLP

17 By: /s/ Benedict Y. Hur

18 Benedict Y. Hur

19 Simona Agnolucci

20 Jayvan E. Mitchell

21 Amanda Maya

22 *Attorneys for Defendant Google LLC*

WILLKIE FARR & GALLAGHER LLP

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

LORI C. ARAKAKI (SBN: 315119)

larakaki@willkie.com

ARGEMIRA FLOREZ (SBN: 331153)

aflorez@willkie.com

One Front Street, 34th Floor

San Francisco, CA 94111

Telephone: (415) 858-7400

Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

ANIBAL RODRIGUEZ, JULIEANNA MUNIZ,
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GOENAGA, JULIAN SANTIAGO, HAROLD
NYANJOM, KELLIE NYANJOM, and SUSAN
LYNN HARVEY individually and on behalf of
all other similarly situated,

Plaintiffs

vs

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688 RS

**DEFENDANT GOOGLE LLC'S
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' REQUESTS FOR
ADMISSION, SET FOUR**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Action Filed: July 14, 2020

Trial Date: Not Set

PROPOUNDING PARTY: Plaintiffs Anibal Rodriguez, Sal Cataldo, Julian Santiago, and Susan Lynn Harvey ("Plaintiffs")

RESPONDING PARTY: Defendant Google LLC

SET NO.: Four

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Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure (“Federal Rules”), Defendant Google LLC (“Defendant” or “Google”) hereby submits these supplemental objections and responses to Plaintiffs Anibal Rodriguez, Sal Cataldo, Julian Santiago, and Susan Lynn Harvey (“Plaintiffs”) Fourth Set of Requests for Admission (each a “Request” and collectively the “Requests”), served on Defendant on September 30, 2022.

PRELIMINARY STATEMENT OF GENERAL OBJECTIONS

1. Each of Google’s responses is subject to, and incorporates, the following general statement and objections. Google specifically incorporates each of these general objections into its responses to each of Plaintiffs’ Requests, whether or not each such general objection is expressly referred to in Google’s responses to a specific request.

2. Google objects to the instructions, definitions, and Requests to the extent that they are broader than, or attempt to impose conditions, obligations, or duties beyond those required by the Federal Rules and/or the Local Rules. Google’s responses will be provided in accordance with the Federal Rules and the Local Rules.

3. Google objects to any Request to the extent that it is overbroad, unduly burdensome, compound, and/or oppressive, or purports to impose upon Google any duty or obligation that is inconsistent with or in excess of those obligations that are imposed by the Federal Rules, the Local Rules, or any other applicable rule or Court order. In particular, Google objects to any Request to the extent that it calls for information not relevant to the claims or defenses of the parties, or proportional to the needs of this case.

4. Google objects to each Request to the extent it is vague, ambiguous, overly broad, or unduly burdensome as to time frame.

5. Google objects to any Request to the extent that it purports to attribute any special or unusual meaning to any term or phrase.

6. Google objects to the Requests to the extent they seek confidential, proprietary, or trade secret information of third parties.

7. Google’s objections and responses to these Requests are not intended to waive or prejudice any objections Google may assert now or in the future, including, without limitation,

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1 objections as to the relevance of the subject matter of any Request, or as to the admissibility of any
2 information or category of information at trial or in any other proceedings. Google expressly
3 reserves any and all rights and privileges under the Federal Rules of Civil Procedure, the Federal
4 Rules of Evidence, the Local Rules, and any other applicable laws or rules, and the failure to assert
5 such rights and privileges or the inadvertent disclosure by Google of information protected by such
6 rights and privileges shall not constitute a waiver thereof, either with respect to these responses or
7 with respect to any future discovery responses or objections.

8 8. Google has responded to the Requests as it interprets and understands them. If
9 Plaintiffs subsequently assert an interpretation of any Request that differs from Google's
10 understanding of that Request, Google reserves the right to supplement its objections and/or
11 responses.

12 **OBJECTIONS TO DEFINITIONS**

13 1. Google objects to the definitions of "all" as overbroad and circular.

14 2. Google objects to the definition of "Class Period" as vague, ambiguous, and
15 overbroad. Plaintiffs' definition of the class period in this case is circular and legally
16 impermissible.

17 3. Google objects to the definition of "Google" as incomprehensible. Google construes
18 "Google" to mean Google LLC. Google further objects to this definition to the extent that it
19 purports to include forms of information not discoverable under the Federal Rules, the Local
20 Rules, or any other applicable authority.

21 4. Google objects to the definition of "Google Service" as vague, ambiguous, and
22 overbroad to the extent that it purports to seek information beyond the scope of this lawsuit, which
23 concerns app measurement data Google receives from third-party mobile applications that have
24 enabled Google Analytics for Firebase, AdMob, or Firebase Cloud Messenger. Google further
25 objects to the definition of "Google Service" as circular, particularly as to "any service." Google
26 further objects to "provides," "code," and "embedded within the app (e.g., Firebase, AdMob)" as
27 vague, ambiguous, and overbroad.

28 5. Google objects to the definition of "Google App" as vague, ambiguous, and

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1 incomprehensible, including to the extent that it relies on the undefined phrases “operated and
2 owned” and “Google affiliate (e.g., Google Maps, YouTube).” Google further objects to the
3 definition of “Google App” as overbroad and partially irrelevant to the extent that it purports to
4 seek information beyond the scope of this lawsuit, which concerns app measurement data Google
5 receives from third-party mobile applications that have enabled Google Analytics for Firebase,
6 AdMob, or Firebase Cloud Messenger.

7 6. Google objects to the definition of “Non-Google App” as vague, ambiguous, and
8 incomprehensible, including to the extent that it relies on the undefined phrases “operated and
9 owned” and “Google affiliate (e.g., Google Maps, YouTube).” Google further objects to the
10 definition of “Google App” as overbroad and partially irrelevant to the extent that it purports to
11 seek information beyond the scope of this lawsuit, which concerns app measurement data Google
12 receives from third-party mobile applications that have enabled Google Analytics for Firebase,
13 AdMob, or Firebase Cloud Messenger.

14 7. Google objects to the definition of “User” as ambiguous, overbroad, and partially
15 irrelevant, including because it purports to include individuals who are not part of the applicable
16 class defined by Plaintiffs in Paragraph 231 of the Third Amended Complaint (ECF No. 131).

17 8. Google objects to the definition of “WAA” as vague, ambiguous, and overbroad.
18 Google construes “WAA” to mean the account-level setting known as “Web & App Activity.”

19 9. Google objects to the definition of “WAA-Off Data” as vague, ambiguous, and
20 incomprehensible, including because of its use of the undefined terms and phrases “data generated
21 by a user’s use,” which fails to distinguish between individual users and their mobile devices, and
22 fails to define the term “generated”; “employ or embed any Google service . . . while Web & App
23 Activity (WAA) or Supplemental Web & App Activity (sWAA) was disabled,” which employs
24 the term “Google service,” and therefore fails to distinguish between Google products and services
25 intended for end-users and those intended for app developers; “information generated by or during
26 a user’s visit to an app,” which fails to define “information,” “generated,” and “visit.”

27 Google additionally objects to the extent this definition incorporates the vague, ambiguous, and
28 overbroad term “services” without limitation, and also purports to include applications that do not

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1 employ GA for Firebase, AdMob, and/or Firebase Cloud Messenger.

2 **RESPONSES TO REQUESTS FOR ADMISSION**

3 **REQUEST FOR ADMISSION NO. 23:**

4 Since the start of the Class Period, there has never been a way for a User to prevent Google
5 from receiving WAA-Off Data.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

7 Google objects to this Request as vague and ambiguous.

8 Google also objects that the request is compound.

9 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
10 provide a concrete range of time.

11 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
12 be meaningless.

13 Google further objects to this Request to the extent that it seeks information protected by
14 the attorney-client privilege and/or the attorney work product doctrine.

15 Subject to and without waiving the foregoing objections, Google responds as follows:
16 Denied.

17 **REQUEST FOR ADMISSION NO. 24:**

18 Since the start of the Class Period, there has never been a way for a User to prevent Google
19 from saving WAA-Off Data.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

21 Google objects to this Request as vague and ambiguous.

22 Google also objects that the request is compound.

23 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
24 provide a concrete range of time.

25 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
26 be meaningless.

27 Google further objects to this Request to the extent that it seeks information protected by
28 the attorney-client privilege and/or the attorney work product doctrine.

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1 Subject to and without waiving the foregoing objections, Google responds as follows:

2 Denied.

3 **REQUEST FOR ADMISSION NO. 25:**

4 At least one Google log contains one or more bits and/or fields that reliably shows whether
5 specific event-level traffic was generated while WAA was “off.”

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

7 Google objects to this Request as vague and ambiguous.

8 Google also objects that the request is compound.

9 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
10 provide a concrete range of time.

11 Google also objects that the term “event-level traffic” is unintelligible or so overbroad as
12 to be meaningless.

13 Google also objects that the term “reliably” is vague and ambiguous.

14 Google further objects to this Request to the extent that it seeks information protected by
15 the attorney-client privilege and/or the attorney work product doctrine.

16 Subject to and without waiving the foregoing objections, Admitted.

17 **REQUEST FOR ADMISSION NO. 26:**

18 Google has derived revenues from its storage and use of WAA-Off Data.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

20 Google objects to this Request as vague and ambiguous.

21 Google also objects that the request is compound.

22 Google also objects that the term “derived revenues” is vague and ambiguous.

23 Google also objects that the term “storage” is vague and ambiguous.

24 Google also objects that the term “use” is vague and ambiguous.

25 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
26 be meaningless.

27 Google further objects to this Request to the extent that it seeks information protected by
28 the attorney-client privilege and/or the attorney work product doctrine.

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1 Subject to and without waiving the foregoing objections, Google responds as follows:

2 Denied.

3 **REQUEST FOR ADMISSION NO. 27:**

4 Since the start of the Class Period, Google could have redesigned its products that save
5 WAA-Off Data, including but not limited to the Firebase SDK and the Google Mobile Ads SDK,
6 so that no WAA-Off Data would be saved by Google.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

8 Google objects to this Request as vague and ambiguous.

9 Google also objects that the request is compound.

10 Google also objects that the request is irrelevant.

11 Google also objects that the term “redesigned” is vague and ambiguous.

12 Google also objects that the term “saved” is vague and ambiguous.

13 Google also objects that this Request is an incomplete hypothetical.

14 Google further objects to this Request to the extent that it seeks information protected by
15 the attorney-client privilege and/or the attorney work product doctrine.

16 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
17 it calls for information beyond Google’s knowledge.

18 **REQUEST FOR ADMISSION NO. 28:**

19 Google can delete all WAA-Off Data stored by Google.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

21 Google objects to this Request as vague and ambiguous.

22 Google also objects that the request is compound.

23 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
24 be meaningless.

25 Google also objects that this Request is an incomplete hypothetical.

26 Google further objects to this Request to the extent that it seeks information protected by
27 the attorney-client privilege and/or the attorney work product doctrine.

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1 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
2 it calls for information beyond Google’s knowledge.

3 **REQUEST FOR ADMISSION NO. 29:**

4 Google has used WAA-Off Data to track, model, or measure cross-app or -site
5 conversions. For purposes of this Request, “cross-app or -site conversions” includes a scenario in
6 which a User interacts with an advertisement within one app, or while on one website, and then
7 “converts” with respect to that prior advertisement within a different app or website (including but
8 not limited to by making a purchase, installing an app, opening an app, or filling out a form).

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

10 Google objects to this Request as vague and ambiguous.

11 Google also objects that the request is compound.

12 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
13 be meaningless.

14 Google also objects that the term “track, model, or measure” is vague and ambiguous.

15 Google also objects that the term “interacts” is vague and ambiguous.

16 Google also objects that the term “converts” is vague and ambiguous.

17 Google further objects to this Request to the extent that it seeks information protected by
18 the attorney-client privilege and/or the attorney work product doctrine.

19 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
20 it calls for information beyond Google’s knowledge.

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

22 Denied.

23 **REQUEST FOR ADMISSION NO. 30:**

24 Since the start of the Class Period, Google has not provided Users with any way to view
25 WAA-Off Data stored by Google.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

27 Google objects to this Request as vague and ambiguous.

28 Google also objects that the request is compound.

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1 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
2 provide a concrete range of time.

3 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
4 be meaningless.

5 Google also objects that the term “view” is vague and ambiguous.

6 Google further objects to this Request to the extent that it seeks information protected by
7 the attorney-client privilege and/or the attorney work product doctrine.

8 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
9 it calls for information beyond Google’s knowledge.

10 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

11 Denied.

12 **REQUEST FOR ADMISSION NO. 31:**

13 Since the start of the Class Period, Google has not provided Users with any way to delete
14 WAA-Off Data stored by Google.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

16 Google objects to this Request as vague and ambiguous.

17 Google also objects that the request is compound.

18 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
19 provide a concrete range of time.

20 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
21 be meaningless.

22 Google also objects that the term “way to delete” is vague and ambiguous.

23 Google also objects that the term “stored” is vague and ambiguous.

24 Google further objects to this Request to the extent that it seeks information protected by
25 the attorney-client privilege and/or the attorney work product doctrine.

26 Subject to the foregoing, Google responds that it can neither admit or deny this Request, as
27 it calls for information beyond Google’s knowledge.

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SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 31:

Denied.

REQUEST FOR ADMISSION NO. 32:

Google cannot identify any privacy policy, terms of service, or other disclosure by a Non-Google App that explicitly informed or informs Users that Google will save WAA-Off Data. For purposes of this Request, “explicitly” requires at a minimum that the disclosure either refer by name to Web & App Activity (WAA) or supplemental Web & App Activity (sWAA) or inform Users that Google will save data relating to their app activity without regard to their Google settings.

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

Google objects to this Request as vague and ambiguous.

Google also objects that the request is compound.

Google also objects that the term “explicitly informed or informs” is vague and ambiguous.

Google also objects that the term “save data” is vague and ambiguous.

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 33:

Non-Google Apps that use any of GA for Firebase, AdMob, and Cloud Messaging would continue to function and be usable even if Google did not store WAA-off Data collected by way of GA for Firebase, AdMob, and Cloud Messaging.

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

Google objects to this Request as vague and ambiguous.

Google also objects that the request is compound.

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Google also objects that the term “usable” is vague and ambiguous.

Google also objects that the term “did not store” is vague and ambiguous.

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to the foregoing, Google responds that it can neither admit or deny this Request, as it calls for information beyond Google’s knowledge.

REQUEST FOR ADMISSION NO. 34:

Google saves WAA-Off Data generated during Users’ interactions with Non-Google Apps by way of webviews.

RESPONSE TO REQUEST FOR ADMISSION NO. 34:

Google objects to this Request as vague and ambiguous.

Google also objects that the term “Users’ interactions” is vague and ambiguous.

Google also objects that the term “saves” is vague and ambiguous.

Google also objects that the term “by way of webviews” is vague and ambiguous.

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows:
Denied.

REQUEST FOR ADMISSION NO. 35:

Google cannot identify any non-Google source or disclosure that explicitly informs Users that Google saves WAA-Off Data. For purposes of this Request, “explicitly” requires at a minimum that the source refer by name to Web & App Activity (WAA) or supplemental Web & App Activity (sWAA). For purposes of this Request, “non-Google sources” refers to news articles, academic publications, or any other publications not authored by Google.

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RESPONSE TO REQUEST FOR ADMISSION NO. 35:

Google objects to this Request as vague and ambiguous.

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google also objects that the term “explicitly informs” is vague and ambiguous.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 36:

Since the start of the Class Period, Google has maintained at least one dashboard, log, or table that reliably tracks WAA and sWAA “on-and-off events for all Google Account Ids on an individual level.” (citing Google’s Resp. to Interrogatory No. 13). For purposes of this Request, “reliably” means that the dashboard, log, or table is accurate.

RESPONSE TO REQUEST FOR ADMISSION NO. 36:

Google objects to this Request as vague and ambiguous.

Google also objects that the request is compound.

Google also objects that the term “dashboard, log, or table” is vague and ambiguous.

Google also objects that the term “reliably tracks” is vague and ambiguous.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows:

Admitted.

REQUEST FOR ADMISSION NO. 37:

Google has used WAA-Off Data to track, model, or measure conversions that occur across Google and non-Google properties. This Request refers to a scenario in which a User interacts with an advertisement within a Google app, or while on a Google website, and then “converts” with respect to that prior advertisement within a non-Google app or non-Google website

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(including but not limited to by making a purchase, installing an app, opening an app, or filling out a form). This Request also includes the inverse scenario, where a User interacts with an advertisement within a non-Google app, or while on a non-Google website, and then “converts” with respect to that prior advertisement within a Google app or while on a Google website (including but not limited to by making a purchase, installing an app, opening an app, or filling out a form). Google has used WAA- Off Data to track, model, or measure conversions within those scenarios.

RESPONSE TO REQUEST FOR ADMISSION NO. 37:

Google objects to this Request as vague and ambiguous.

Google also objects that the request is compound.

Google also objects that request refers to an unintelligible “scenario” and “inverse scenario.”

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows:
Denied.

REQUEST FOR ADMISSION NO. 38:

Since the start of the Class Period, apart from discontinuing use of the Google Analytics for Firebase service, there has been no way for an app developer whose Non-Google App uses Google Analytics for Firebase to prevent Google from receiving and saving WAA-Off Data.

RESPONSE TO REQUEST FOR ADMISSION NO. 38:

Google objects to this Request as vague and ambiguous.

Google also objects that the term “Class Period” is vague and ambiguous because it fails to provide a concrete range of time.

Google also objects that the term “receiving and saving” is vague and ambiguous.

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1 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
2 be meaningless.

3 Google further objects to this Request to the extent that it seeks information protected by
4 the attorney-client privilege and/or the attorney work product doctrine.

5 Subject to and without waiving the foregoing objections, Google responds as follows:
6 Denied.

7 **REQUEST FOR ADMISSION NO. 39:**

8 Google saves WAA-Off Data generated during Users’ interactions with the Google Search
9 app.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

11 Google objects to this Request as vague and ambiguous.

12 Google also objects that the term “Users’ interaction” is vague and ambiguous.

13 Google also objects that the request is irrelevant.

14 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
15 be meaningless.

16 Google further objects to this Request to the extent that it seeks information protected by
17 the attorney-client privilege and/or the attorney work product doctrine.

18 **REQUEST FOR ADMISSION NO. 40:**

19 Using data that is stored within Google logs and data sources, and setting aside any and all
20 Google policies and technical impediments, it is possible to join WAA-off Data with data tied to a
21 user’s Google account.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

23 Google objects to this Request as vague and ambiguous.

24 Google also objects that this Request as unintelligible because it requests that Google
25 “set[] aside any and all . . . technical impediments,” and thus provide a response based in fantasy.

26 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
27 be meaningless.

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1 Google further objects to this Request to the extent that it seeks information protected by
2 the attorney-client privilege and/or the attorney work product doctrine.

3 **REQUEST FOR ADMISSION NO. 41:**

4 Google saves WAA-Off Data generated during Users' interactions with the YouTube app.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

6 Google objects to this Request as vague and ambiguous.

7 Google also objects that the term "Users' interaction" is vague and ambiguous.

8 Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to
9 be meaningless.

10 Google also objects that the request is irrelevant.

11 Google further objects to this Request to the extent that it seeks information protected by
12 the attorney-client privilege and/or the attorney work product doctrine.

13 **REQUEST FOR ADMISSION NO. 42:**

14 Google saves WAA-Off Data generated during Users' interactions with the Gmail app.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

16 Google objects to this Request as vague and ambiguous.

17 Google also objects that the term "Users' interaction" is vague and ambiguous.

18 Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to
19 be meaningless.

20 Google also objects that the request is irrelevant.

21 Google further objects to this Request to the extent that it seeks information protected by
22 the attorney-client privilege and/or the attorney work product doctrine.

23 **REQUEST FOR ADMISSION NO. 43:**

24 Google saves WAA-Off Data generated during Users' interactions with the Google Maps
25 app.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

27 Google objects to this Request as vague and ambiguous.

28 Google also objects that the term "Users' interaction" is vague and ambiguous.

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1 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
2 be meaningless.

3 Google also objects that the request is irrelevant.

4 Google further objects to this Request to the extent that it seeks information protected by
5 the attorney-client privilege and/or the attorney work product doctrine.

6 **REQUEST FOR ADMISSION NO. 44:**

7 Since the start of the Class Period, every version of the Google Privacy Policy has included
8 the following provision: “We will not reduce your rights under this Privacy Policy without your
9 explicit consent.”

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

11 Google objects to this Request as vague and ambiguous.

12 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
13 provide a concrete range of time.

14 Google further objects to this Request to the extent that it seeks information protected by
15 the attorney-client privilege and/or the attorney work product doctrine.

16 Subject to and without waiving the foregoing, Google Admits that the privacy policies it
17 has produced to Plaintiff are accurate.

18 **REQUEST FOR ADMISSION NO. 45:**

19 Google can change its processes so that Google no longer saves WAA-Off Data.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

21 Google objects to this Request as vague and ambiguous.

22 Google also objects that the term “saves” is vague and ambiguous.

23 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
24 be meaningless.

25 Google also objects that the request is irrelevant.

26 Google further objects to this Request to the extent that it seeks information protected by
27 the attorney-client privilege and/or the attorney work product doctrine.

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REQUEST FOR ADMISSION NO. 46:

From March 31, 2020 through the present, Google’s Terms of Service has contained the following provision: “California law will govern all disputes arising out of or relating to these terms, service-specific additional terms, or any related services, regardless of conflict of laws rules.”

RESPONSE TO REQUEST FOR ADMISSION NO. 46:

Google objects to this Request as vague and ambiguous.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing, Google admits that the Terms of Service it has produced to Plaintiff are accurate.

REQUEST FOR ADMISSION NO. 47:

From April 14, 2014 through March 30, 2020, Google’s Terms of Service included the following provision: “The laws of California, U.S.A., excluding California’s conflict of laws rules, will apply to any disputes arising out of or relating to these terms or the Services.”

RESPONSE TO REQUEST FOR ADMISSION NO. 47:

Google objects to this Request as vague and ambiguous.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing, Google admits that the Terms of Service it has produced to Plaintiff are accurate.

REQUEST FOR ADMISSION NO. 48:

Google has used WAA-Off Data it saves to train at least one machine-learning algorithm used by at least one Google product or service, including but not limited to Google Search, YouTube, Gmail, AdMob, Ad Manager, or Ads.

RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Google objects to this Request as vague and ambiguous.

Google also objects that the term “saves” is vague and ambiguous.

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Google also objects that the term “train” is vague and ambiguous.

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google also objects that the request is irrelevant.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Denied.

REQUEST FOR ADMISSION NO. 49:

Since the start of the Class Period, Google has used WAA-Off Data to create User profiles. For purposes of this Request, the phrase “User profiles” shall include identification of characteristics (e.g., age, gender, location, interests) associated with Users or devices.

RESPONSE TO REQUEST FOR ADMISSION NO. 49:

Google objects to this Request as vague and ambiguous.

Google also objects that the term “Class Period” is vague and ambiguous because it fails to provide a concrete range of time.

Google also objects that the term “User profile” is vague and ambiguous.

Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to be meaningless.

Google further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing, Denied.

REQUEST FOR ADMISSION NO. 50:

Since the start of the Class Period, Google has served ads to WAA-Off Users based on User profiles. For purposes of this Request, the phrase “User profiles” shall include identification of characteristics (e.g., age, gender, location, interests) associated with Users or devices.

RESPONSE TO REQUEST FOR ADMISSION NO. 50:

Google objects to this Request as vague and ambiguous.

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1 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
2 be meaningless.

3 Google also objects that the term “Class Period” is vague and ambiguous because it fails to
4 provide a concrete range of time.

5 Google also objects that the request is irrelevant.

6 Subject to and without waiving the foregoing objections, Denied.

7 **REQUEST FOR ADMISSION NO. 51:**

8 Google saves WAA-Off Data generated during Users’ interactions with the Google
9 Chrome app, including through webviews on Non-Google Apps.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

11 Google objects to this Request as vague and ambiguous.

12 Google also objects that the request is compound.

13 Google also objects that the term “saves” is vague and ambiguous.

14 Google also objects that, as defined, the term “Users” is vague, ambiguous, and
15 overbroad.

16 Google also objects that the term “WAA-Off Data” is unintelligible and so overbroad as to
17 be meaningless.

18 **REQUEST FOR ADMISSION NO. 52:**

19 Google Firebase, Google Analytics for Firebase, AdMob, and Cloud Messaging are not
20 essential to the functioning of Non-Google Apps.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

22 Google objects to this Request as vague and ambiguous.

23 Google also objects that the term “essential” is vague and ambiguous.

24 Google also objects that the term “functioning” is vague and ambiguous.

25 Google also objects that the request is irrelevant.

26 Google further objects to this Request to the extent that it seeks information protected by
27 the attorney-client privilege and/or the attorney work product doctrine.
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Dated: November 7, 2022

WILLKIE FARR & GALLAGHER LLP

By: /s/ Eduardo E. Santacana
Eduardo E. Santacana

Attorneys for Defendant Google LLC

PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is Willkie Farr & Gallagher LLP, One Front Street, San Francisco, CA 94111.

On November 7, 2022, I served the following document(s) on the individuals identified below:

- **DEFENDANT GOOGLE LLC'S RESPONSES TO PLAINTIFFS' REQUESTS FOR ADMISSION, SET FOUR**

☒ by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe "pdf" format. The transmission was reported as complete and without error.

Mark C. Mao
Beko Osiris Ra Reblitz-Richardson
Erika Britt Nyborg-Burch
BOIES SCHILLER FLEXNER LLP
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile: (415) 999 9695
E-mail: mmao@bsflp.com
E-mail: brichardson@bsflp.com
E-mail: enyborg-burch@bsflp.com

James Lee
Rossana Baeza
BOIES SCHILLER FLEXNER LLP
100 SE Second Street, Suite 2800
Miami, FL 33131
Telephone: (305) 539-8400
E-mail: jlee@bsflp.com
E-mail: rbaeza@bsflp.com

Jesse Michael Panuccio
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW
Washington, DC 20005
Telephone: (202) 237-2727
E-mail: jpanuccio@bsflp.com

William Christopher Carmody
Shawn J. Rabin
Steven M. Shepard
Alexander Patrick Frawley
Ryan Sila
SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330
E-mail: bcarmody@susmangodfrey.com

Amanda Bonn
SUSMAN GODFREY LLP
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
E-mail: abonn@SusmanGodfrey.com

E-mail: srabin@susmangodfrey.com
E-mail: sshepard@susmangodfrey.com
E-mail: afrawley@susmangodfrey.com
E-mail: rsila@susmangodfrey.com

Ian B. Crosby
Jenna Golda Farleigh
SUSMAN GODFREY LLP
401 Union Street
Ste. 3000
Seattle, WA 98101-3000
Telephone: 206-516-3880
E-mail: icrosby@susmangodfrey.com
E-mail: jfarleigh@susmangodfrey.com

John A. Yanchunis
Ryan J. McGee
Jean Sutton Martin
Ra Olusegun Amen
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505
E-mail: jyanchunis@forthepeople.com
E-mail: rmcgee@forthepeople.com
E-mail: jeanmartin@forthepeople.com
E-mail: ramen@forthepeople.com

Michael Francis Ram
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Telephone: (415) 358-6913
E-mail: MRam@forthepeople.com

Attorneys for Plaintiffs

Executed on November 7, 2022 at San Francisco, California.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

/s/ Harris Mateen
Harris Mateen